

CORRES. CONTROL  
OUTGOING LTR. NO.

DOE ORDER # 5400.1

97-RF-03364

DIST.	LTR	ENC
B		
SSSEN, STAN		
BURL, TONY		
CARD, BOB		
HILL, J.A.		
MANI, VIC		
MARTINEZ, LEN		
MCKAY, BOB		
O'BRIEN, GEORGE		
TUOR, NANCY		
VOORHEIS, GARY		
HYDER, M.D.	X	
M. MARICIA, A.	X	X
MINNER, R.	X	
BANKSTER, R.	X	
DETAMORE, J.	X	
FOX, R.D.	X	X
KIDD, D.L.	X	X
LUBDELL, D.	X	
MYERS, D.	X	X
PEESTON, D.	X	
SAUER, P.	X	



KAISER-HILL  
COMPANY

July 1, 1997

97-RF-03364

Russell McCallister  
Regulatory Liaison Division  
DOE, RFFO

NOTIFICATION OF NON-APPLICABILITY TO THE COLORADO DEPARTMENT OF  
PUBLIC HEALTH AND ENVIRONMENT THAT THE SITE LANDFILLS ARE NOT  
SUBJECT TO NEW SOURCE PERFORMANCE STANDARDS AND EMISSION  
GUIDELINES FOR LANDFILLS - CAP-086-97

Enclosed with this correspondence are the Notification of Non-applicability forms and  
attachments which indicate the design capacity of the Rocky Flats Environmental Technology  
Site (Site) Existing and New Sanitary Landfills. This information must be submitted to the  
Colorado Department of Public Health and Environment, Air Pollution Control Division  
(CDPHE, APCD) to indicate that the Site Existing and New Sanitary Landfills are not subject  
to the New Source Performance Standards (NSPS) emission guidelines for municipal solid  
waste landfills. The NSPS and emission guidelines are codified at Title 40 of the Code of  
Regulations (CFR), Part 60, Subparts WWW and Cc, respectively. Based on the NSPS  
provisions for municipal solid waste landfills, the Site Existing and New Sanitary Landfills are  
exempt from this regulation.

Attachments 2 and 5, Notification of Non-applicability forms for the Existing and New  
Sanitary Landfills, need to be signed by Keith Klein. The Notification of Non-applicability  
forms and attachments must be submitted to Kirsten King at the CDPHE, APCD-SS-B1,  
4300 Cherry Creek Dr. S., Denver, CO 80202-1530.

If you have any questions regarding this correspondence, please contact me at extension  
2440.

CORRES. CONTROL X X  
ADMIN RECORD/080  
TRAFFIC  
PATS/T130G

CLASSIFICATION:

UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER

SIGNATURE:

Exempt: CEX-266-95

Date:

IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:

☐ PARTIAL/OPEN  
☐ CLOSED

LTR APPROVALS:

APM:pfj

Copy and 1 cc: R. McCallister

Attachments (7)

cc:

J. A. Dion

- DOE, RFFO w/o Attach.

ADMIN RECORD

ORIG. & TYPIST INITIALS:

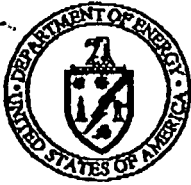
R.M. RFF  
RF-46469 (Rev. 7/95)

Kaiser-Hill Company, L.L.C.

Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000

Address: P.O. Box 464, Golden, Colorado 80402-0464

SW-A-005231



## Department of Energy

ROCKY FLATS FIELD OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

JUL 10 1997

97-DOE-05122

Ms. Kirsten King  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Dr. South, APCD-SS-B1  
Denver, Colorado 80202-1530

Dear Ms. King:

Enclosed are the notification of non-applicability forms and attachments which indicate the design capacity of the Rocky Flats Environmental Technology Site (Site) existing and new sanitary landfills. This information is submitted to indicate that the Site existing and new sanitary landfills are not subject to the New Source Performance Standards (NSPS) or emission guidelines for municipal solid waste landfills. The NSPS and emission guidelines are codified at 40 Code of Federal Regulations 60, Subparts WWW and Cc, respectively. Based on the NSPS provisions for municipal solid waste landfills, the Site existing and new sanitary landfills are exempt from this regulation.

If you have any questions regarding this correspondence, please contact Russell McCallister at 966-9692.

A handwritten signature in black ink, appearing to read "Keith A. Klein", is positioned above the typed name.

Keith A. Klein  
Deputy Manager for Technical Programs

Enclosure

cc w/o enc:  
R. Fox, CDPHE  
J. Legare, AMEC, RFFO  
J. Dreger, OCC, RFFO  
R. McCallister, RLG, RFFO  
B. Nininger, K-H  
C. Patnoe, K-H  
M. Hyder, Radian

**NOTIFICATION OF NON-APPLICABILITY TO THE COLORADO DEPARTMENT OF  
PUBLIC HEALTH AND ENVIRONMENT THAT THE SITE LANDFILLS ARE NOT  
SUBJECT TO NEW SOURCE PERFORMANCE STANDARDS (NSPS)  
AND EMISSION GUIDELINES FOR LANDFILLS**

Attached are the Notification of Non-applicability forms and attachments which indicate the design capacity of the Rocky Flats Environmental Technology Site (Site) existing and new sanitary landfills. This information must be submitted to the Colorado Department of Public Health and Environment, Air Pollution Control Division (CDPHE, APCD) to indicate that the Site existing and new sanitary landfills are not subject to the New Source Performance Standards (NSPS) emission guidelines for municipal solid waste landfills. Attachments 2 and 5 are the signed Notification of Non-applicability forms for the existing and new sanitary landfills.

**Existing Sanitary Landfill**

The NSPS emission guidelines apply to municipal solid waste landfills constructed or modified before May 30, 1991 and which have design capacities greater than or equal to 3.3 million cubic yards (yd<sup>3</sup>). The maximum design capacity of the Site existing sanitary landfill is 571,000 yd<sup>3</sup>, which is significantly less than the 3.3 million yd<sup>3</sup> threshold.

The landfill covers an area of approximately 20 acres. Waste material is thinnest along the boundaries and thickest along the east-west axis of the landfill. The thickness of waste material ranges from less than one foot to 40 feet near the east face of the landfill. Attachment 4 includes a plan view of the existing landfill site.

The volume of sanitary waste and cover soil that was placed in the landfill from 1968 through 1996 is estimated at approximately 534,859 yd<sup>3</sup>. Future projections estimate that an additional 36,141 yd<sup>3</sup> of sanitary waste and daily cover soil will be placed in the landfill until it reaches the 571,000 yd<sup>3</sup> capacity. Approximately 30% of the total material deposited in the landfill is daily cover soil. Based on 30% cover soil, the volume of sanitary waste that will be placed in the landfill is estimated at approximately 399,700 yd<sup>3</sup>. The maximum design capacity has been estimated using historical and future waste disposal rates and information obtained during the Operable Unit 7 Phase I Resource Conservation & Recovery Act (RCRA) facility investigation/remedial investigation (RFI/RI) characterizing the areal and vertical extent of landfill material. The landfill is currently scheduled for closure in 2006. Attachment 3 shows volume estimates for previous landfill operations from 1968 through 1996 and projected estimates for future landfill operations from 1997 to 2006.

**New Sanitary Landfill**

The NSPS regulates new landfills that are built or modified on or after May 30, 1991 and which have design capacities greater than or equal to 3.3 million yd<sup>3</sup>. The new sanitary landfill consists of a 200,000 yd<sup>3</sup> disposal cell. Attachments 6 and 7 include plan and cross sectional views indicating the 200,000 yd<sup>3</sup> capacity of Cell No. 1. However, the Site has issued a subcontract for the removal of sanitary solid waste generated at the Site to an offsite municipal solid waste landfill as an alternative to utilizing the new sanitary landfill. The subcontractor will provide labor and equipment to collect, remove, and dispose of all sanitary solid waste generated at the Site. Offsite disposal of sanitary waste is scheduled to start in the fall of 1997.

Kaiser-Hill will retain the existing construction permit to operate the new sanitary landfill, pending a possible decision by the Department of Energy, Rocky Flats Field Office (DOE, RFFO) to use the landfill in the future. The new sanitary landfill is currently included in the Site Operating Permit application, as well.

Based on the NSPS provisions for municipal solid waste landfills, the Site existing and new sanitary landfills are exempt from this regulation.

EXISTING SANITARY LANDFILL

If Rule does Not apply  
Notification of Non-applicability  
or initial design capacity notification

This serves to notify the Colorado Department of Public Health and Environment, Air Pollution Control Division, that the Rocky Flats Plant Site Landfill landfill operated by DOE ROCKY FLATS OFFICE has:

- ☒ a design capacity less than 2.5 million cubic meters (3.3 million cubic yards) and is required only to submit an initial design capacity report, a map, or plot of the landfill is attached; or
- ☐ accepts only construction and non degradable waste and is not covered by this regulation; or
- ☐ accepts only medical waste and is not covered by this regulation.

DOE ROCKY FLATS OFFICE realizes that if there are modifications to the landfill or to the type of waste accepted we must submit an updated design capacity report to the Colorado Department of Public Health and Environment, Air Pollution Control Division.

I have reviewed the information enclosed in this package in its entirety, and to the best of my knowledge, I certify that the statement contained in this notification is true, accurate, and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7-122.1, C.R.S.

Keith Klein  
Deputy Manager for Technical Services

Department of Energy, Rocky Flats Field Office

John A. Hill  
Vice President, Environmental Management  
& Compliance  
Kaiser-Hill Company, L.L.C.

Signature

Date

Signature

Date

**Volume Estimates of Existing Landfill  
Previous Operations**

<b>Year</b>	<b>Volume of Compacted Waste (yd<sup>3</sup>)</b>	<b>Volume of Compacted Waste &amp; Fill (yd<sup>3</sup>)</b>	<b>Cumulative Compacted Waste &amp; Fill (yd<sup>3</sup>)</b>
1968	10,178	13,571	13,571
1969	10,178	13,571	27,142
1970	10,178	13,571	40,713
1971	10,178	13,571	54,284
1972	10,178	13,571	67,855
1973	10,178	13,571	81,426
1974	10,178	13,571	94,997
1975	10,000	13,333	108,330
1976	10,000	13,333	121,663
1977	10,000	13,333	134,996
1978	10,000	13,333	148,329
1979	10,000	13,333	161,662
1980	10,000	13,333	174,995
1981	10,000	13,333	188,328
1982	10,000	13,333	201,661
1983	10,000	13,333	214,994
1984	10,000	13,333	228,327
1985	10,000	13,333	241,660
1986	10,000	13,333	254,993
1987	28,125	37,500	292,493
1988	28,125	37,500	329,993
1989	28,031	37,375	367,368
1990	28,125	37,500	404,868
1991	28,125	37,500	442,368
1992	11,964	15,952	458,320
1993	11,964	15,952	474,272
1994	20,113	28,733	503,005
1995	11,073	14,395	517,400
1996	13,430	17,459	534,859

**Volume Estimates of Existing Landfill  
Present and Future Operations**

<b>Year</b>	<b>Volume of Compacted Waste (yd<sup>3</sup>)</b>	<b>Volume of Compacted Waste &amp; Fill (yd<sup>3</sup>)</b>	<b>Cumulative Compacted Waste &amp; Fill (yd<sup>3</sup>)</b>
1997	12,000	15,600	550,459
1998	1,200	1,560	552,019
1999	1,660.87	2,372.62	554,391.62
2000	1,660.87	2,372.62	556,764.24
2001	1,660.87	2,372.62	559,136.86
2002	1,660.87	2,372.62	561,509.48
2003	1,660.87	2,372.62	563,882.10
2004	1,660.87	2,372.62	566,254.72
2005	1,660.87	2,372.62	568,627.34
2006	1,660.87	2,372.62	571,000
<b>TOTAL</b>	<b>426,808</b>	<b>571,000</b>	<b>571,000</b>